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February 28, 2023

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Fagnani v. Scientific Models, Inc.*
Case No.: 1:22-cv-10797

Application granted in part. Defendant's deadline to answer or otherwise respond to the Complaint is extended to **March 30, 2023**. The initial pretrial conference scheduled for March 8, 2023, is adjourned to **March 29, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **March 22, 2023, at 12:00 P.M.**

Dated: March 1, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

The undersigned represents Mykayla Fagnani, on behalf of herself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Scientific Models, Inc., (“Defendant”). This is a joint submission being filed on behalf of the Plaintiff and Defendant pursuant to Your Honor’s February 23, 2023, Order. (Dkt. 8).

The undersigned respectfully requests that the Initial Conference scheduled for March 8, 2023, at 12:00 PM (Dkt. 8) be adjourned for 30 days because although they have not filed a Notice of Appearance yet, Counsel for the Defendant was recently retained. This extension will allow Counsel for the Defendant to review this matter thoroughly and consult with their client. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 30 days to respond to the Complaint until March 30, 2023. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff’s Counsel. This is the Plaintiff’s first request for an extension. Defendant joins in this request.

Respectfully submitted,

GOTTLIEB & ASSOCIATES
/s/ Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

cc: Mariya Gonor, Esq., via e-mail
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Counsel for the Defendant